

# EXHIBIT 13

DEPARTMENTAL DISCIPLINARY COMMITTEE  
FIRST JUDICIAL DEPARTMENT  
SUPREME COURT - APPELLATE DIVISION

-----x

In the Matter of:

RP #2018.7008

STEVEN DONZIGER

-----x

61 Broadway  
New York, New York 10006  
Monday, September 16, 2019

BEFORE: JOHN HORAN, REFEREE

APPEARANCES:

For the Departmental Disciplinary Committee  
First Judicial Department:

61 Broadway  
2nd Floor  
New York, New York 10006

BY: NAOMI GOLDSTEIN, ESQ.  
GEORGE DAVIDSON, ESQ.

For the Respondent:

RICHARD FRIEDMAN, ESQ.  
MARTIN GARBUS, ESQ.  
AARON PAGE, ESQ.

**Carole Ludwig**  
***Transcription Services***  
**141 East Third Street #3E**  
**New York, New York 10009**  
**Phone: (212) 420-0771**  
**Email: [transcription420@aol.com](mailto:transcription420@aol.com)**

1 SALAZAR - DIRECT (by Friedman)  
2 to get to come to court, a Raphael Pandom  
3 (phonetic), am I pronouncing that right?

4 THE WITNESS: Yes, I just heard minutes ago  
5 that he had been denied his visa application  
6 because he has been told he was denied because  
7 he was on Chevron's list.

8 MR. FREIDMAN: And what was his position --

9 MR. DAVIDSON: I'm sorry, hearsay, I'm  
10 going to ask that that be stricken?

11 THE REFEREE: Well, it is hearsay, I will  
12 allow it for what it's worth.

13 MR. FREIDMAN: Let me ask you this, did you  
14 have some concerns, yourself, about coming here  
15 to testify?

16 THE WITNESS: Yes, I have concerns about my  
17 visa. I have never come to the States to do  
18 anything related to the case besides attending  
19 the general shareholders meeting and this time  
20 for this hearing.

21 MR. FREIDMAN: Okay. I want to turn to the  
22 Ecuador, I don't know if this is the right  
23 term, Ecuador Civil Code, the Code of  
24 Procedure?

25 THE WITNESS: Civil Procedure Code, yeah.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

C E R T I F I C A T E

I, Carole Ludwig, certify that the foregoing transcript of proceedings in the State of New York, County of New York, was prepared using PC-based transcribing software and is a true and accurate record of the proceedings.

Signature Carole Ludwig

Date: September 20, 2019